

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

RICHARD J. JANKOWSKI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 16-cv-50103
)	
DEAN FOODS COMPANY, and DEAN)	Honorable Judge Iain D. Johnston
DAIRY HOLDINGS, LLC,)	
)	Magistrate Judge Lisa A. Jensen
Defendant,)	
)	
and)	
)	
ALTERA INSURANCE USA, INC.,)	
)	
Respondent.)	

MOTION FOR CONDITIONAL JUDGMENT

NOW COMES Plaintiff, Richard J. Jankowski, by and through his counsel, Timothy J. Coffey of The Coffey Law Office, P.C., and respectfully moves this Honorable Court to enter a Conditional Judgment against Respondent, ALTERA INSURANCE USA, INC., and in support thereof states as follows:

1. On December 18, 2020, this Court entered an Amended Judgment in this matter in the amount of \$5,066,286, all of which remains unsatisfied.
2. On December 30 2020, Plaintiff served the Respondent with a Third Party Citation to Discover Assets related to the Amended Judgment.
3. Respondent has failed to file an Answer to same, failed to appear on the return date (January 29, 2021 at 10 am, remote via Zoom), and has failed to date to produce any of the documents requested in the Rider attached to the Citation, or otherwise

respond.

4. Attached as Plaintiff's Group Exhibit "A" is a copy of the Third Party Citation to Discover Assets, Rider thereto and Proof of Service.

WHEREFORE, Plaintiff prays that this Honorable Court enter a Conditional Judgment against Respondent, ALTERA INSURANCE USA, INC., in the sum of \$5,066,286 plus costs, and enter any other relief it deems just.

Respectfully Submitted,
Plaintiff, RICHARD J. JANKOWSKI,

By: /s/ Timothy J. Coffey
Timothy J. Coffey, Esq.
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